From: Jim Jacobs
To: mdove@fec.gov
Subject: ActBlue and Public Campaign Financing
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When I give a campaign contribution through ActBlue and probably others, I view this transaction as essentially between me and the donation target: ActBlue is merely a broker. There is ample precedent for this. I frequently purchase items on line and utilize the services of PayPal. In that case PayPal is a transaction facilitator and not a party to the transaction which is between me and the seller. The same logic applies to credit card companies and banks: they are moving my money according to my wishes.

My understanding is that there is no problem with a credit card company handling the donation nor is their any dispute about a bank handling the fund transfer via a personal check, so there should be no problem with PayPal or ActBlue serving as fund conveyors. If the FEC is concerned that such a mechanism could be exploited to circumvent election financing rules then it should develop a series of reasonable rules which would permit ActBlue to perform this important micro-financing service while preventing the use of this mechanism to as an end-run on campaign finance regulations.

I think that by making it easier for people to provide small donations to campaigns, the ActBlue is acting in the best interests of the American electorate. In the future, if campaigns are able to raise funds in small amounts from a large number of citizens it will democratize the process and reduce the power of big-money, special interest donors. I suggest that the FEC find a way to make this work rather than relying on an ultra-legalistic approach to resolving the issue.

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Jim